



THE UNIVERSITY OF MICHIGAN DEPT. OF TRANSPORTATION
503 THOMPSON STREET
ANN ARBOR, MICHIGAN 48109-1340

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U. S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-000
RE: docket # FAA-2000-8274-135

To Whom It May Concern:

The University of Michigan would like to comment on the Notice of Proposed Rulemaking (NPRM) governing Temporary Flight Restrictions (TFR) (Docket No. FAA-2000-8274; Notice No. OO-13). The University fully supports and endorses the Federal Aviation Administration's efforts to improve aviation safety in this effort.

On no less than six Saturdays each fall, the University is host to approximately 115,000 people who, while watching our football contests, are compressed within a relatively small area. For a number of years approximately 5-12 airplanes towing banners continually circle the stadium for hours before, during, and after games in a relatively tight formation. The University has long contended such activities are a serious threat to the safety and well-being of our attendees.

In addition, our stadium lies directly across the street from a large residential area of Ann Arbor, where literally thousands of other people are endangered. Given the concentration of University facilities and the compactness of adjoining residential neighborhoods, there are very few options for pilots to consider should an emergency landing becoming necessary.

Moreover, Michigan Stadium clearly lies within the five nautical mile radius of the Ann Arbor airport and thus constitutes a specific airport control zone. We believe it can be reasonably argued that such a legion of banner towers circling a huge stadium already violates FAA rules against operating at an "abnormal altitude not necessary for normal flight."

The FAA has properly recognized that such events involving large numbers of spectators are unique. Indeed, in the NPRM itself, the rule lists examples of numerous sporting events that might qualify for TFRs. We would add that football games at the University of Michigan (with a stadium capacity of over 110,000 people) have more citizens at risk than ALL of the other events listed. Clearly, the hazards these low-flying airplanes cause must be weighed against any perceived benefit that these planes provide. As the largest football facility

in the nation, Michigan Stadium needs the protections TFRs can provide even more than the sporting events listed in the NPRM.

Over the years, the University has complained on numerous occasions to the FAA – both to its Great Lakes Region Flight Standards Division and to the Washington office. Each time, the response has been that there were adequate controls in place to make sure there would be no mishaps. However, the NPRM itself indicates to us that this no longer is an acceptable answer to our concerns, and that this issue is not isolated to Michigan Stadium but is indeed a national problem at such large events. We believe that the NPRM correctly perceives that providing special protection for unique large gatherings of people at sporting and other events is in the public interest, and that is why we support it so strongly.

We appreciate the opportunity to comment on this proposal. The FAA, through this initiative, could have a significant impact on providing our 110,000 guests and the neighborhood around our stadium an additional margin of safety and enjoyment not currently afforded. Your Great Lakes Office needs the ability to create TFRs around our stadium on these game days, and we urge you to craft a final version of this rule that will provide us with this protection.

Sincerely yours,



Robert Kasdin
Executive Vice President
& Chief Financial Officer



William C. Martin
Director of Athletics